



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



276840

REPLY TO THE ATTENTION OF

SE-5J

August 21, 2007

Mr. Bruce Everetts  
Illinois Environmental Protection Agency  
1021 N. Grand Ave. East  
P.O. Box 19276  
Springfield, IL 62794-9276

Dear Mr. Everetts:

This letter requests that the Illinois Environmental Protection Agency identify all Applicable, Relevant, and Appropriate Requirements (ARARs) for the proposed removal action at the U.S. Scrap Site located in Chicago, Cook County, Illinois. Any State ARARs identified in a timely manner for this removal action will be complied to the extent practicable.

The United States Environmental Protection Agency (U.S. EPA) has proposed to fund a time-critical removal action to address surface liquids and surface soils on the property. U.S. EPA has proposed to remove and dispose of free standing liquids on the property.

U.S. EPA's Site Assessment, which occurred June 25<sup>th</sup>, 2007, determined that surface liquids showed vinyl chloride as high as 650 ppb, benzene as high as 780,000 ppb, ethylbenzene as high as 14,000,000 ppb, 4-methyl-2-pentanone as high as 1,800,000 ppb, toluene as high as 26,000,000 ppb, total xylenes as high as 84,000,000 ppb, bis (2-ethylhexyl)phthalate as high as 2,800,000 ppb, 1,2-dichlorobenzene as high as 32,000 ppb, diethyl phthalate as high as 7,600 ppb, di-n-butylphthalate as high as 160,000 ppb, 2-methylnaphthalene as high as 1,100,000 ppb, acenaphthene as high as 8,900 ppb, acenaphthylene as high as 10,000 ppb, anthracene as high as 61,000 ppb, benz(a)anthracene as high as 52,000 ppb, benzo(a) pyrene as high as 11,000 ppb, benzo(b)fluoranthene as high as 16,000 ppb, benzo(g,h,i)perylene as high as 9,200 ppb, benzo(k)fluoranthene as high as 13,000 ppb, chrysene as high as 56,000 ppb, dibenz(a,h)anthracene as high as 2,300 ppb, fluoranthene as high as 140,000 ppb, fluorene as high as 68,000 ppb, indeno(1,2,3-cd)pyrene as high as 9,000 ppb, naphthalene as high as 2,800,000 ppb, phenanthrene as high as 270,000 ppb, pyrene as high as 120,000 ppb, alpha chlordane as high as 4,900 ppb, total chlordane as high as 49,000 ppb, gamma chlordane as high as 5,900 ppb. Surface liquids also included several PCBs include aroclor 1242 as high as 240,000 ppb, aroclor 1254 as high as 380,000 ppb, and aroclor 1260 as high as 190,000 ppb.

In addition, U.S. EPA has proposed to excavate and dispose of approximately 2,300 cubic yards of contaminated surface soils. Surface and shallow subsurface (1 – 3 feet) soil samples collected during U.S. EPA's Site Assessment showed a number of contaminants. Analytical results of all five soil samples and one duplicate sample exceeded the maximum concentration of 49 parts per million (ppm) PCBs allowed for non-TSCA regulated landfill disposal, as described in 40 CFR Section 761.60 (a) (3). Total PCBs for samples S-1, S-2, S-3, S-4 and S-6 were between 50 to 500 ppm. Total PCBs for sample S-5 were 7,980 ppm. Analytical results for S-1, S-4, S-5 and duplicate S-6 exceeded 150 ppm for chlordane. The underlying hazardous constituent (UHC), such as chlordane for land disposal restriction is 0.26 mg/kg. The S-5 sample was collected from 3 to 4 feet bgs. Since S-5 sample was not from the surface, pesticides could have possible come from recycling and dumping operations and placing the material into a pit.

Further, analytical results of four soil samples exceeded the TCLP concentrations of one or more constituents listed in 40 CFR Part 261.24 Table 1, indicating hazardous waste characteristics. Results for samples S-1, S-2, S-3 and S-5 exceeded TCLP regulatory limits for benzene. Analytical results for S-5 exceeded TCLP regulatory limits for tetrachloroethene, cadmium and lead. Analytical results for S-1 and S-5 exceeded TCLP regulatory limits for TCE. These results indicate high potential for migration of hazardous substances present at surface or subsurface

Finally, U.S. EPA has proposed to install sheet piling along between the U.S. Scrap property and the Metropolitan Water Reclamation District (MWRD) Of Greater Chicago's property. This purpose of this sheet piling will be to prevent any residual liquids from the U.S. Scrap property from migrating onto MWRD's property.

ARARs for this site primarily include the Toxic Substances Control Act (TSCA) and the Resource Conservation and Recovery Act (RCRA). Many of the wastes being dealt with are likely to be RCRA characteristic wastes, and they will be handled accordingly. Wastes will be transported and disposed of at an acceptable RCRA/CERCLA/TSCA treatment, storage, and disposal facility pursuant to the U.S. EPA Off-Site Rule.

If you have any question regarding this letter, or require more detailed information concerning the U.S. Scrap Site, please do not hesitate to contact me at (312) 886-5907.

Sincerely,

*Michael Harris* for C.T

Craig A. Thomas  
U.S. EPA On-Scene Coordinator